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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 08-434 SI
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
v.)	
)	
LUIGI FULVIO PALMARES AGUILAR,)	
)	
)	
Defendant.)	
_____)	

On July 3, 2008, the parties in this case appeared before the Court for the defendant's arraignment. At that time, the parties requested, and the Court agreed, to exclude all time under the Speedy Trial Act between July 3, 2008 and August 15, 2008 because defense counsel needs time to review electronic discovery, and also because the attorneys representing both parties are unavailable until that date. The parties represented that granting the continuance was the reasonable time necessary for preparation of defense counsel and continuity of defense counsel

1 and government counsel. 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of
2 justice served by granting such a continuance outweighed the best interests of the public and the
3 defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

4
5 SO STIPULATED:

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7 JOSEPH P. RUSSONIELLO
United States Attorney

8
9 DATED: July 3, 2008

/s/
10 TAREK J. HELOU
Assistant United States Attorney

11
12 DATED: July 3, 2008

/s/
13 GEOFFREY HANSEN
Attorney for Defendant Margaret Pek Hoon Lim

14
15 For the reasons stated above, the Court finds that exclusion of time from July 3, 2008
16 through August 15, 2008 is warranted and that the ends of justice served by the continuance
17 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161
18 (h)(8)(A). The failure to grant the requested continuance would deny both parties continuity of
19 counsel, and deny the defendant effective preparation of counsel, and would result in a
20 miscarriage of justice. 18 U.S.C. §3161(h)(8)(B)(iv).

21
22 SO ORDERED.

23
24 DATED: _____

25 THE HONORABLE MARIA-ELENA JAMES
United States Magistrate Judge